Inexperience with Updating Interfaces

119. During the time period since CLECs have begun to take advantage of some of Ameritech's ordering functions, Ameritech has not yet issued a new ordering release. Such a release is scheduled for the end of June. Until Ameritech has coordinated such a release with CLECs there is no way to know how smoothly the process will go. A smooth process is vital, because otherwise error rates and problems will skyrocket when a new release is issued.

120. In addition, Ameritech's process is hardly ideal even for much smaller changes. As the Illinois Staff recently explained, Ameritech's ordering guides "do not yet contemplate a positive reporting mechanism for changes or updates." Illinois Staff Brief p. 18 (ex. 8). Carriers should not have to check the internet daily for changes that effect them. Illinois Staff Brief p. 19 (ex. 8).

Ameritech's Documentation Remains Inadequate

121. Ameritech's documentation, although an improvement over its earlier documentation, remains inadequate for another reason as well. The April guides do not discuss Ameritech's business rules. As a result, if MCI desires to place an order for a customer entitled to Lifeline service for low income customers, for example, MCI does not know what it needs to submit to prove the customer is eligible for Lifeline and does not know the process by which it needs to coordinate the customer's discount with Ameritech. Similar problems exist with respect to special services for the blind and special billing under Illinois' Telephone Assistance Program, as well as on numerous other occasions where special business rules exist.

Unbundled Elements

122. As bad as Ameritech's operational readiness is for resale, the situation is infinitely worse when it comes to unbundled elements. Ameritech uses different OSS interfaces for different types of orders of unbundled elements. It proposes to use an EDI interface for unbundled local switching, and for the combination of unbundled local switching and an unbundled loop. Rogers Aff. ¶ 39. It proposes to use an Access Service Request ("ASR") interface for other unbundled elements. (Rogers Aff. ¶ 12) There are several major problems with these proposed interfaces.

The ASR Interface is Not the Correct Interface to Employ

123. While Ameritech's EDI interface for resale ordering and some unbundled elements is somewhat out of date, it is, at least, the correct basic standard to employ. The same cannot be said for Ameritech's proposed use of the ASR process to order unbundled loops. ASR is an interface designed to enable IXCs (and CAPs) to order access arrangements from the LECs. It is certainly not the case that it is appropriate to use for a particular function a standard interface developed and approved for a different function. As an interface for ordering unbundled loops, ASR is not in accordance with industry guidelines, which specify EDI formats -- as Bellcore appears to acknowledge in a letter attached to Mr. Rogers' affidavit. As such, Ameritech's decision to deploy ASR for this function is inconsistent with its own previous acknowledgment that "[t]he ability to do business between multiple local exchange carriers and incumbent LECs

dictates that . . . electronic interfaces adhere to national or industry-based standards where available."[7]

124. Ameritech's ASR process is deficient not only because it is proprietary. As Brooks has explained based on its experience in ordering loops, the receipt of ASR orders sent to Ameritech must be manually checked, the number of errors is extremely high, and the percentage of loop orders that have actually been completed on time is dismal. (Todd Stein Testimony in Michigan § 271 proceeding, pp. 158-60, ex. 13).

125. Ameritech's decision to use different interfaces for different pieces of what should be single transactions greatly exacerbates the burdens faced by the CLEC in using a proprietary interface. In particular, separating the ordering process for loops and interim local number portability (ILNP) between two separate and distinct ordering systems, ASR for loops and LSR via EDI for ILNP, will require duplicate work for a simple and important combination MCI intends to use to provide basic phone service. In fact, MCI must also submit a third order -- a distinct EDI order for disconnect, as part of the process of migrating this basic phone service. Ameritech also requires MCI to specify on the order for the loop, the order for disconnect, and the order for ILNP that the three orders are related to each other; Ameritech will then use this information to match up the orders. This is a process fraught with the potential for error. It is also a process that has not been tested. Up until now, orders for ILNP and disconnect have proceeded by fax not by EDI.

126. This fragmentation of ordering processes is as unnecessary as it is onerous. The OBF has defined the requirements for a mechanized LSR to be used with the EDI interface that accommodates (among other things) the ability to order unbundled loops, switches, and ILNP

[7] Ameritech July 10 Ex Parte, at 5, quoted in Local Competition Order ¶ 513.

together. No separate disconnect order is required, because an order for a loop, switch port, and ILNP already tells the RBOC that the customer is switching carriers. This is the industry standard solution Ameritech should use.

127. Although MCI has run 15 unbundled loop trials with Ameritech, we have not to date used its ASR interface for reasons that underscore why Ameritech's proposed solution is wholly inadequate. MCI is gearing up to offer local service in many states at once, and as I have explained, it is simply too expensive and burdensome for MCI to develop the capability to use nonstandard interfaces in all of these states. This is especially true because the fragmentation of Ameritech's ordering process ensures that MCI would realize little benefit were we to make the efforts necessary to use Ameritech's ASR. MCI, like any CLEC, requires an automated solution that accommodates all discrete pieces that are involved in the provision of service via unbundled elements because that whole transaction is only as efficient as the efficiency of its weakest part. It should be understood that the weakest link in Ameritech's loop ordering process is significantly so.

128. Ameritech contends that "[i]n the future, Telecommunications Industry Forum ('TCIF') customer service guidelines may endorse the use of EDI for ordering unbundled loops," Rogers Aff. ¶ 10, and that when they do, Ameritech will move to the industry standard within 120 days of agreeing with CLECs on the implementation details. This is disingenuous. First, it has long been clear that the industry would endorse the use of EDI for the ordering of loops; certainly, no one ever thought that the industry would adopt a fragmented ordering process such as Ameritech's. Second, the OBF actually endorsed the use of EDI for loops in October of 1996 and released final specifications (EDI version 7.0) in February of 1997. As explained above, while the pro-forma balloting necessary for ANSII approval of EDI version 7.0 is now complete, this was

not, in any case, a prerequisite for approval by the OBF. That process was already completed in February. Indeed, the OBF is far along on its work on EDI version 7.1. In any case, Ameritech has known for a long time that the industry would approve use of EDI for ordering unbundled loops. But it has not adopted EDI. Indeed, it did not even begin meeting with CLECs to discuss EDI for loops until April 1997.

129. Those meetings have shown that Ameritech's promise to implement EDI 7.0 within 120 days of TCIF approval and agreement on implementation details with CLECs is likely to do little good. In those meetings, Ameritech has proposed implementing a non-standard version of EDI 7.0 in which relatively few of the fields match the industry standard. For example, Ameritech's proposal does not support hunting in the same way as the industry standard; it precludes the ordering of more than two features on one line thus actually degrading functionality Ameritech now offers, and it only allows the PIC freeze indicator to be defined at the account level, not the line level. As a result, CLECs are unlikely to reach agreement with Ameritech for quite some time. The real date for Ameritech's promised implementation of EDI 7.0 is therefore the end of the year. Even then, however, there is no assurance that Ameritech will correctly implement EDI 7.0. If it implements its view of EDI 7.0, it will have left out most of the industry standard. Ameritech has also not made it clear whether it will still require a separate order for disconnect after implementing EDI 7.0 And even it adopts the correct standard, Ameritech's implementation will not yet have been tested to determine whether it is operational for ordering loops, or combinations of loops and number portability.

130. In the interim, while MCI awaits Ameritech's implementation of EDI 7.0, MCI must choose whether to waste money building an ASR interface that it wholly inadequate and that

will be replaced at the end of the year, or whether to use a fully manual process for ordering loops and substantially slow our market entry. This dilemma is not consistent with the development of local competition.

Ameritech's Ordering Interfaces for Unbundled Elements are not Operationally Ready

131. As is made readily apparent from Mr. Meixner's chart, Ameritech is just at the beginning stages of making its ordering interfaces operational for unbundled elements. The only unbundled elements which Ameritech has provided commercially are unbundled loops and end office integration and, ostensibly, one aspect of unbundled transport (new account/service). Meixner Aff. Schedule 3. Ameritech has no commercial experience providing unbundled local switching, unbundled tandem switching, interim local number portability, or unbundled local transport (disconnecting or changing an account or service). Meixner Aff. Schedule 3. In fact, Ameritech has not yet even performed carrier to carrier testing of unbundled local switching (trunk ports), unbundled tandem switching, or unbundled local transport (disconnecting or changing an account or service). Meixner Aff. Schedule 3. In MCI's understanding, Ameritech does not even claim to be able to disconnect ILNP via EDI or to provide orders for unbundled operator services or directory assistance via EDI.

132. In other words, the only experience Ameritech has with ordering unbundled elements is exclusively confined to its ASR interface, an interface it recognizes as inadequate for the ordering of loops and intends to replace. So in the one place Ameritech has some experience, albeit largely unsuccessful experience, that experience will soon be outdated.

133. Ameritech also has no experience with OSS for combinations of unbundled elements. In fact, Ameritech does not present any data showing that it has even internally tested the ordering process for providing combinations of unbundled elements. Nor do its new product guides even offer adequate information on how to order combinations of elements. The guides basically discuss four combinations Ameritech will offer without a bonafide request process, and even for these combinations the guides basically say to call Ameritech to determine how to order them. Until April, the guides offered even less information, arguably none at all, on the ordering of combinations of unbundled elements, and, indeed, offered almost no information on ordering unbundled elements individually.

134. Whatever the reasons for these facts (at least for MCI, the reason for the lack of experience is largely Ameritech's refusal to let us test until recently), the result is that it is impossible to conclude that Ameritech's EDI interface and downstream business processes will work in a satisfactory manner. It necessarily takes time for carriers to develop internal support systems and coordinate with each other. Given the lengthy process which it has taken for Ameritech to begin to approach operational readiness for resale POTS, it is difficult to imagine how Ameritech can claim to be ready to service orders for unbundled switching, ILNP, and combinations of unbundled elements, when carriers are just beginning the process of coordination. This is especially true, because the processes for ordering unbundled elements and combinations of unbundled elements are vastly more complicated than the processes for ordering resale POTS. Unlike resold products, which largely involve a billing change for a product already provided at retail, unbundled elements have never been ordered before as individual products.

135. Even if Ameritech could solely rely on internal testing to prove operational readiness it could not do so here. Ameritech has not presented any data showing the breakdown of its test transactions for individual unbundled elements and combinations of elements. Ann Wiecki, an auditor on the staff of the Wisconsin Public Services Commission, evaluated Ameritech's testing data and noted that "[o]nly one test case was run for an unbundled network element. All the other testing was of resold services." Prefiled Direct Testimony of Ann W. Wiecki, Operation Support Systems Docket 6720-TI-120, March 19, 1997, p. 11 (ex. 15). Ameritech also presents no data showing the success rates of any testing transactions it did perform.

Provisioning

Provisioning involves the exchange of information between carriers in which one executes a request for a set of products or services from the other with attendant acknowledgments and status reports. There are four provisioning sub-functions, i.e., four types of reports the provisioning ILEC must communicate to the requesting CLEC: firm order confirmation, error notification, change in order status (jeopardy notification), and order completion. Ameritech uses the EDI interface to perform these functions for resale. Ameritech uses the ASR interface for firm order confirmation for unbundled elements but does not employ -- and apparently does not even intend to employ -- any form of automated interface for the other three sub-functions. This is totally unsatisfactory.

136. First, the appropriate and standardized interface for firm order confirmation is, again, EDI and not ASR. The use of a non-standard ASR system would impose substantial and unnecessary costs upon CLECs for additional software and training unique to the Ameritech region.

137. Second, the lack of any process to provide jeopardy notification and order completion for unbundled elements is inexplicable. Ameritech excuses this deficiency by asserting that there is no need for a mechanized interface for order status and order completion when provisioning UNEs, because most unbundled loop orders are coordinated with the requesting carrier. Rogers Aff. ¶ 85. This argument is nothing less than absurd. Ameritech seems to be arguing that there is no need for a completion notification, because generally Ameritech coordinates with MCI technicians to turn up an unbundled loop. But telling an MCI technician that an order is complete and expecting the technician to somehow input that information into MCI's systems is hardly the same as an automated process of completion notification. It wastes time and resources and is far less effective. In addition, Ameritech may not even coordinate with the MCI technician at the time the due date for an order is placed jeopardy. Such coordination certainly does not substitute for an automated process of jeopardy notification.

138. Customers demand prompt and accurate information regarding the timely provision of telecommunications services. Customers must be notified promptly if the date is changed for their service to be turned up; this is especially true given Ameritech's track record of missing due dates. Consequently, CLECs like MCI require a mechanized interface for both resold and unbundled services in order to provide timely and up-to-date information regarding the status, potential delay, and final completion of the provision of these services. Relying on the Ameritech

service representative to provide the necessary information manually is not acceptable. Indeed, the fact that Ameritech does offer an EDI interface for these subfunctions in the resale context only underscores the inappropriateness of their refusal to do the same for ordering of unbundled elements.

139. Ameritech's excuse for its inadequate provisioning processes also fails to explain its manual process for error notification in orders for unbundled loops. Any coordination for turning up loops does not occur at the stage where errors would be found in orders. A manual process for error notification leads to delay, human discovery of "errors" that do not really exist, and cryptic descriptions of errors that are difficult to discern.

140. Even in resale, where Ameritech appropriately uses an automated EDI process for provisioning, Ameritech's provisioning processes are not yet operationally ready. The fact that many of MCI's orders are in limbo, which I discussed above, may in fact result from a problem with completion notification. MCI has also received jeopardies on too many of its orders (35 of 474), has received a number of jeopardies after receiving a completion notice (7 of 474), and has failed to receive a FOC on a number of orders for which it eventually received a completion notice (7 of 474). Even when Ameritech performs its provisioning processes in the correct order and in fact completes these processes, these processes take far too long. On fifty three percent of MCI's EDI orders, it has taken three days or more just to receive a firm order confirmation that the order was approved; in its documentation Ameritech quotes the same day. As of June 6, 93% of our EDI orders had not been completed within 48 hours, 50% had not been completed within 72 hours, and 11% had not been completed in a week -- even though Mr. Rogers states that Ameritech delivers 86% of completion notices within 48 hours and that it has significantly reduced the number that

take more than one day, Rogers Aff. ¶¶ 75, 80. MCI's statistics do not even include the orders which have disappeared in Ameritech's systems and have not yet been completed.

141. The effect of these delays and errors is significant. On one occasion, Ameritech sent a complete to MCI on May 22 -- and then a FOC on May 28. Neither the FOC nor the completion was correct. When an MCI contractor went out on May 30 to perform the inside wiring work, both the customer and MCI assumed that the customer would have dial tone after the work was completed. The customer did not! The completion notice sent by Ameritech had been incorrect.

142. The effect of delay is also important. Delays in FOCs prevent MCI from sending a confirmation to the customer. Also, all of these delays create uncertainty and force MCI to promise service dates much longer than those Ameritech can deliver. Recently, Ameritech rejected the order of one customer, because the address submitted said Road instead of Avenue. Even after this rejection, the difficulties with Ameritech's OSS meant that MCI could only promise that service would be turned up in 7-10 days. When the customer called Ameritech, Ameritech had his service up and running in one day. The customer was, of course, very disappointed with MCI.

143. Along with the delays in FOCs and completion notices, Ameritech processes far too many orders manually before sending an error message back to MCI (just as it uses manual processing far too frequently for correct orders before sending them on in its systems). Although Ameritech has not provided any data showing the amount of manual intervention in its process for error notification, the fact that manual intervention is required for common errors such as the absence of PIC information or an incorrect USOC code suggests that the number is extremely high.

Manual intervention delays the process. Also, sometimes Ameritech representatives notify MCI of errors that do not in fact exist; for example, on May 20, Ameritech sent MCI a reject and then later in the day sent MCI a message to disregard the reject order issued. In addition, sometimes Ameritech representatives provide error notifications that are extremely difficult to discern. Only simple edits would be required to significantly reduce manual intervention in the error notification process.

144. Finally, in using Ameritech's provisioning processes, MCI discovered a systems deficiency: when an error notification is sent to MCI, it specifies exactly one error even if the order contained more than one. An efficient process would identify all errors at once. This deficiency can significantly delay completion of an order that has multiple errors. For example, MCI sent an order on April 22 that was rejected four separate times for different errors (two of which were in fact Ameritech errors). Each time that MCI corrected an error and again resent it, the order was rejected for a new error. As a result, the order was not completed until May 26 -- over a month after it had originally been sent. If the original rejection notice had specified all of the errors, MCI could have corrected them all and the order would then have been completed much more quickly. The effects of this deficiency are significant. As a result of the need to resubmit some orders multiple times, 500 orders submitted by MCI have required 900 separate transactions.

145. Ameritech claims that it will fix this "deficiency" in its June 30 release for EDI. This is a good sign, but the proof remains to be seen. Also, because Ameritech uses a manual process for error notification for a high percentage of orders, even fixing the deficiency for fully automated orders will leave much of the problem unsolved. MCI is skeptical that Ameritech will

fix the deficiency for manual orders, because Ameritech's manual forms only have space to write in a very limited amount of information on errors.

146. All of these problems with Ameritech's EDI provisioning processes exist for simple POTS resale orders. As Ameritech attempts to use these processes for more complex orders, other problems are likely to develop.

Maintenance and Repair

147. Ameritech proposes to use an electronic bonding ("EB") solution developed by the T1M1 committee for repair and maintenance functions. Ameritech correctly states that this is the current industry standard specification. Although it will be essential for ILECs to upgrade to a specification (now in development at the ECIC) that allows for true bi-directional, "agent-to-agent" communication when such an interface becomes available, MCI fully supports the interface Ameritech purports to have deployed for the present.

148. Ameritech has claimed elsewhere that there is no question that the repair and maintenance interface is operational. Rogers Aff. ¶ 91. Mr. Rogers claims that MCI has used the EB interface to report troubles on POTS lines since 1996. Rogers Aff. ¶ 91. This is misleading at best. MCI has never used Ameritech's EB interface to report troubles of MCI local customers. When MCI long distance customers have called MCI to report troubles that in fact concerned Ameritech's local service, MCI has used the EB pipe to forward the information to Ameritech. This was essentially using the EB interface as an electronic fax; MCI did not check the status of the trouble reports, obtain completions, or in any other way use the interface as it is intended to be

used to report troubles for a CLEC's own local customers. Mr. Meixner claims that Ameritech's maintenance and repair interface has been actually used by Ameritech Payphone Services, Meixner Aff., Schedule 3, but, as Mr. Rogers acknowledges, this use was of Ameritech's GUI not its EB interface. Rogers Aff. ¶ 93. According to Mr. Rogers himself, the GUI "is not an interface as such . . . [and] will be useful primarily to small carriers." Rogers Aff. ¶ 92.

149. Aside from its misleading attempt to ascribe usage of local EB to MCI, Ameritech seemingly acknowledges that no CLEC is currently using the T1M1-approved EB solution for communicating maintenance and repair information for local service -- even in carrier to carrier testing. Meixner Aff., Schedule 3; Testimony of Ameritech Witness Joseph Rogers in MI § 271 proceedings, p. 22 (ex. 13). Accordingly, Ameritech bases its view that its EB interface is sufficiently tested entirely on internal testing and the fact that it has used that interface successfully for purposes of exchanging repair and maintenance information related to access services. In my opinion, Ameritech reads its experience with the T1M1-approved interface for far more than it is worth.

150. The maintenance and repair processes involved in the access arena are, in many respects, quite different from those that will be necessary when competing carriers are using unbundled elements to provide local service. In the latter scenario, but not in the former, Ameritech must, among other things, be able to request authorization to perform deregulated work activities at the CLEC customer's site, and to receive communication of trouble history information from the CLEC. Indeed, in its recent filing before this Commission, Southwestern Bell Telephone Company acknowledged that it had to perform many enhancements to its electronic bonding interfaces to make it functional for local. Ham Aff. ¶ 38.

151. In addition to this general difference between access and local services regarding the types of communication that must be exchanged, specific problems are presented by the fact that Ameritech, like several other BOCs, uses two trouble handling systems: Work Force Administration (WFA) and Loop Maintenance Operating System (LMOS). When another carrier sends a trouble ticket to Ameritech (via the EB interface), that ticket will be routed to either WFA or LMOS depending entirely on the category of service against which the trouble is written: access services are routed to WFA for resolution, and local services are routed to LMOS. The LMOS system is severely limited in its ability to support cases of trouble sent over Ameritech's OSS interface. These limitations are due to the fact that LMOS has far fewer dedicated fields than WFA for the presentation of information to the Ameritech technician. Consequently, much of the information that an MCI technician enters in an access service ticket destined for Ameritech's WFA system today will be invisible to the Ameritech technician looking at a local service trouble report presented in Ameritech's LMOS system tomorrow. The MCI technician has no view into the LMOS limitations, and thus has no way of knowing what data will be presented to an LMOS user, and what will be lost. However, an Ameritech technician inputting a trouble report does not suffer from the same handicap. Because the Ameritech technician's access to LMOS is not mediated by an OSS gateway, he or she has visibility into the data presentation limitations of LMOS, and therefore will enter no more information than can be presented to a user at a later time. Thus, the level of service LMOS provides to Ameritech's local service customers will be greater than it could provide to MCI's local service customers.

152. For these reasons, the extent to which Ameritech's relative success with the T1M1 interface in exchanging trouble reports for access service is translatable to the local exchange

markets remains, at best, entirely uncertain. Whether the operational processes necessary to support maintenance and repair in the context of unbundled network elements used to provide local exchange service will prove satisfactorily coordinated with the EB interface Ameritech uses is a factual question that, at this point, remains unanswered.

153. Of course, Ameritech explains that it is not its fault that it has no experience providing its T1M1 interface, since it has offered that interface and other carriers have not yet chosen to use it. Rogers Aff. ¶ 91. I am not claiming that Ameritech's lack of experience is its fault. While MCI has every intention of using Ameritech's T1M1 interface, it has not yet attempted to do so. This is in part, because Ameritech's ordering interfaces are still so deficient that MCI has not attempted to generate a high volume of orders -- at which point automation of maintenance and repair will become necessary. Regardless of whether Ameritech is to blame, however, the fact remains that MCI has no assurance that Ameritech's T1M1 interface is operational. Although Ameritech claims to have performed internal tests on its T1M1 interface, Ameritech has not even presented internal testing data that provide any assurance. Mr. Meixner presents data that ostensibly show capacity readiness but presents no data showing the success rate of transactions over the interface. Mr. Rogers presents no data showing successful internal testing of the interface. In addition, given Ameritech's false trumpeting of the validity of its internal tests with respect to its ordering processes, I am more than a little wary to accept Ameritech's proclamation of the validity of its tests of its maintenance and repair processes.

154. Moreover, where MCI does have some limited experience with Ameritech's maintenance and repair processes, with the back end of those processes, MCI has had some difficulties. According to Ameritech's own parity reports to MCI, 50% of MCI's lines that have

lost dial tone have taken more than 24 hours to restore -- the longest taking more than a week. (ex. 24).[8]

155. In addition, when one of our test customers lost dial tone on Friday 3/21, the customer was able to dial into Ameritech's automated 611 repair system and was able to open a trouble ticket with Ameritech, despite the fact that this was an MCI customer and the system was supposed to immediately kick out such a complaint. Ameritech's 611 system was unable to recognize that this was a resold account. The trouble ticket was reviewed later in the day by Ameritech personnel who finally determined that the account was for an MCI resale customer. Ameritech called the MCI customer back to inform him that he must open a trouble ticket with MCI. MCI's trouble handling group then sent a trouble ticket to Ameritech on Friday. Ameritech has since advised us that they do not have a record of the Friday trouble ticket number sent by MCI. I believe that this may be because the Ameritech systems have no visibility to a trouble ticket once it has been closed. Ameritech has been able to find a subsequent trouble ticket that was sent for this customer on Monday, 3/24. Service was finally restored to this customer on 3/26, i.e., five days after the customer initially reported the outage.

156. After this problem was brought to Ameritech's attention, it informed MCI that it has since changed their system so that if a resold customer calls into 611, that when the customer's phone number is entered, it will immediately be told that they are a resold customer. Despite Ameritech's representations, as of 4/21/97, an MCI resale customer was still able to access Ameritech's 611 system.

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[8]Although Ameritech's parity reports are stamped confidential, Ameritech released them to Ali Miller of MCI without any restriction on how she would use them.

157. I have every reason to presume that Ameritech will eventually be able to eliminate this specific bug in its repair and maintenance systems. However, it illustrates a broader point: this is just another instance of a problem that was uncovered only after MCI started sending live customers through. This error was not discovered during Ameritech's own internal testing process.

Billing

158. The billing function encompasses two discrete sub-functions: daily usage reports that provide the information required to enable CLECs to bill their end users, and monthly bills detailing what the CLEC owes the ILEC.

Daily Usage Reports

159. Ameritech purports to use the EMR format for daily usage feeds. EMR is the appropriate interface for the communication of usage feeds and has been the industry standard for months. Rogers Aff. ¶ 96. Despite Ameritech's claims to be using EMR, Ameritech has actually been providing header and trailer records to MCI in EMI format since January. Indeed, Ameritech has now told MCI that, although it is planning to switch to use of EMR, the work needed to do so will not be carried out for some time. Ameritech has refused to commit to any date for carrying out this work. This is so even though MCI has continually explained to Ameritech that it has been receiving usage feeds in EMI format and sent a formal letter to that effect in March (ex. 25).

160. EMI format, which is used for interexchange carrier messages, should not be used for local exchange messages. MCI has had to reprogram its systems to handle EMI headers and trailers. Even after undertaking the expense of reprogramming its systems to handle EMI headers and trailers, MCI cannot read the actual data, because the data in the records has indicators set that show the data is from an interexchange carrier which causes the records to error out in our systems. In order to use this data, MCI would have to recognize what is going on with the data and develop software to use it. Even if it did so, the non-standard nature of EMI would force MCI to employ manual intervention on its end of the interface -- increasing both costs and errors. In addition, Ameritech's usage feeds contain non-standard records for specific services such as auto-call back, call trace and repeat dialing, and non-standard records for unrated calls which cause these calls to error out in MCI's systems. MCI reported these problems to Ameritech months ago and has yet to receive any response. As a result, MCI is presently unable to use Ameritech's usage feeds.

161. Although Ameritech purports to have significant experience with EMR, Rogers Aff. ¶ 98, the fact that MCI is receiving daily usage feeds in entirely the wrong format certainly demonstrates that Ameritech's daily usage feed is not operationally ready. Moreover, Ameritech's purported experience is for resale only, Rogers Aff. ¶ 99, and perhaps, although Ameritech provides absolute no details, for unbundled local switching line ports. Meixner Aff., Schedule 3. Ameritech offers no evidence that its daily usage feed is ready to bill any other unbundled elements. It has never been clear to me whether and, if so, how Ameritech purports to transmit daily usage information for use of unbundled switching. This gap makes it impossible to conclude that Ameritech's OSS interfaces for billing are competitively adequate.

162. The accuracy, timeliness and accessability of usage feeds are matters of tremendous importance. It is common knowledge that problems which plagued Sprint's billing systems in the late 1980s -- resulting in long-delayed and inaccurate subscriber bills -- cost that carrier tens of millions of dollars in lost revenue and incalculable consumer goodwill.[9] A CLEC that is unable to bill its end-users accurately because of problems with the usage feeds it receives from the ILEC will suffer similar marketplace consequences.

Monthly Bills

163. Ameritech uses the Ameritech Electronic Billing System (AEBS) for monthly billing of CLECs for resold services. Use of AEBS for monthly billing is flatly unacceptable. The industry standard is a specification of the Carrier Access Billing System (CABS) called Billing Output Specifications. Ameritech is the only RBOC that uses AEBS. PacBell, for example, has committed to use of CABS. As a preliminary matter, use of AEBS instead imposes excessive and unjustified costs on those new entrants that are already using CABS for access billing in Ameritech's region and that require a uniform national standard for national operations. MCI has been forced to accept some of those costs, and has expended considerable time and money adopting our systems to accommodate AEBS. This process was particularly difficult, because Ameritech was very dilatory in providing us all the information we needed to complete the task. Although MCI has completed this task within the last couple of weeks, the AEBS system

[9] See, for example, Calvin Sims, Errors Continue to Plague U S Sprint's Billing System, NY Times, at D1 (Mar. 3, 1988).

continues to impose significant disadvantages on MCI. First, unlike CABS, MCI does not yet know whether AEBS provides sufficient information to adequately audit its bills. Second, as a proprietary system, AEBS multiplies MCI's costs for training and for performing any updates to the system. It also increases MCI's difficulty in learning to use the full capability of the system.

164. Once again, however, the problems with Ameritech's OSS systems are not limited to its choice of interface. Rather, MCI's experience belies Ameritech's assertions elsewhere that all orders have been properly billed and that CLECs have received all necessary bill detail. While MCI has been developing the systems needed to interact with Ameritech's proprietary AEBS system, it has been receiving paper bills from Ameritech. These bills only provide sufficient detail to perform a very high level audit of Ameritech's billing. Even a high level audit, however, has revealed substantial problems with Ameritech's billing processes. An audit of billing for the entire state of Michigan for March and April shows that Ameritech over billed MCI by 12%. In contrast, a typical bill in the access world would be off by approximately 2%.

165. Ameritech inappropriately billed MCI for some services at retail rates instead of wholesale rates, billed MCI for features which it did not order (our own systems cannot even process orders for these features), and billed MCI too much for late charges and taxes. This over billing is probably significantly understated; because of the lack of detail in the paper bill, except where MCI's systems could not process an order for a particular feature, MCI had no way to determine whether it had in fact ordered a feature for which it was billed.

166. In the unbundled network elements context, unlike the resale context, Ameritech uses CABS for actual billing of CLECs for unbundled network elements. MCI supports use of CABS. Again, however, the extent to which the interfaces are translatable to the new context for

which Ameritech proposes to use them depends on the downstream business processes. Ameritech has stated elsewhere that it has used CABS for billing carriers for unbundled loops since April 1995. However, to my knowledge, Ameritech has not provided any information to assist in assessing how well the system has performed. Moreover, even if Ameritech's version of CABS has worked satisfactorily for billing unbundled loops, whether Ameritech can provide timely and accurate bills for the use of other unbundled elements is entirely unknown. Indeed, Mr. Meixner's chart shows that Ameritech has not even performed any carrier to carrier testing of CABS with respect to unbundled switching, unbundled transport, or service provider number portability. Meixner Aff., Schedule 3.

Conclusion

Ameritech's use of ASR for ordering loops, USOC codes for ordering generally, EMI and AEBS for billing, and possibly EDI via EAP for pre-ordering, all underscore Ameritech's failure to deploy the industry's standard interface for those particular functions. Ameritech's troubled experience deploying its EDI interface for ordering resale POTS demonstrates the need for substantial experience with an interface, while the BOC still has § 271 as an incentive, before an interface is operationally ready. Ameritech has still not worked out the substantial problems with EDI for resale POTS. It can hardly claim to be ready to process orders, at parity, for more complex services and unbundled elements, and to provide effective and timely pre-ordering, billing and maintenance and repair. Ameritech is simply not ready.

I hereby swear, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge and belief.

Samuel L. King

Subscribed and sworn before me this 9th day of June, 1997.

Notary Public

My commission expires: 8/31/97

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Application of Ameritech	)	
Michigan Pursuant to Section	)	
271 of the Telecommunications	)	CC Docket No. 97-137
Act of 1996 to Provide In-	)	
Region, InterLATA Services in	)	
Michigan	)	

Exhibit D:
Attachments to Affidavit of Samuel King on Behalf of MCI Telecommunications Corporation